



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

October 17, 2012

HAND DELIVERED
CHEVRON RICHMOND REFINERY
In Reply Refer to:
Chevron Richmond Refinery, Richmond, CA

Nigel Hearne, Manager
Chevron Richmond Refinery
841 Chevron Way
Richmond, CA 94801

RE: Request for Information
Chevron Richmond Refinery

Dear ~~Mr. Hearne~~ ^{Nigel}:

The United States Environmental Protection Agency ("EPA") Region IX is continuing our investigation of the Chevron Corporation. (the "Company") located at the Chevron Richmond Refinery (the "Facility") at 841 Chevron Way, Richmond California 94801. The request for information enclosed with this letter ("Information Request") seeks information and documents relating to the Company's compliance with Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9603; Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act ("EPCRA"), 42 U.S.C. §§ 11002 – 11022; and Section 112(r) of the Clean Air Act ("CAA"), 42 U.S.C. § 7412(r).

This Information Request is authorized pursuant to the following federal environmental statutes:

- Comprehensive Environmental Response, Compensation, and Liability Act, as amended, 42 U.S.C. § 9604.
- Emergency Planning and Community Right-to-Know Act, 42 U.S.C. § 11001 *et seq.*
- Clean Air Act, as amended, 42 U.S.C. § 7414


Please provide the requested information and documents either by mail or hand-delivery within 10 days of your receipt of this letter. **Ensure that each document provided in response to this information request indicates the EPA question number (see enclosed "Instructions" and "Information Request") for which the document is responsive, as well as the Chevron Bates Numbers.** Electronic copies are acceptable. EPA believes that much of the requested information is, or should be, readily available at the Facility. The Company's response should be directed to:

Ms. Mary Wesling (SFD-9-3)
EPCRA/RMP Compliance Officer
U.S. EPA Region IX
75 Hawthorne St.
San Francisco, CA 94105

Please note that the Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5), or Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 413(a)(3). These statutory provisions authorize EPA to seek penalties up to \$37,500 for each day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have questions about the legal aspects of this Information Request, please contact Joshua Wirtschafter, Assistant Regional Counsel for U.S. EPA Region IX, at (415) 972-3912. The Region IX technical contact for this information request is Mary Wesling, EPCRA/RMP Compliance Officer. Ms. Wesling can be reached at (415) 972-3080. We thank you in advance for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Meer', with a stylized flourish at the end.

Daniel A. Meer, Assistant Director
Superfund Division

Enclosures
Information Request (Instructions, Definitions, Questions)

cc: M.Wesling, U.S. EPA Region IX
J. Wirtschafter, U.S. EPA Region IX
M. Farley, Pillsbury

ENCLOSURE

INSTRUCTIONS

1. Please provide a separate response to each request. For each document produced, identify the request to which it is responsive, as well as the Chevron Bates Numbers.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form.
3. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
4. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice.
5. Notice is hereby given, pursuant to 40 CFR §§ 2.301(h) and 2.310(h), that EPA may disclose confidential information provided by the Company to EPA's authorized representatives, including its contractors, Science Applications International Corporation ("SAIC") and Energy and Resource Consulting Group ("ERC"). Confidential information may be disclosed to EPA's authorized representatives for the following reasons: to assist with document handling, inventory and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 CFR §§ 2.301(h) and 2.310(h), the Company may submit, along with its response to this Information Request, any comments regarding EPA's disclosure of confidential information to its authorized representatives.
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.
7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.
8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding.

DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean Chevron Corporation, or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.
2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by Chevron Corporation, at the Chevron Richmond Refinery property or properties located at 841 Chevron Way, Richmond, California, or contiguous or adjacent to that address.
3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.
4. "Chemical" shall mean any extremely hazardous substance listed in Appendices A and B of 40 CFR Part 355; any hazardous substance, as defined in Section 101(14) of CERCLA, including any mixtures of hazardous substances with any other substances, such as petroleum products; and any pollutant or contaminant, as defined in Section 101(33) of CERCLA, including any mixtures of pollutants or contaminants with any substances, such as petroleum products; and any regulated substance listed pursuant to section 112(r)(3) of the Clean Air Act as amended, in 40 CFR § 68.130.
5. "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and shall include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances or pollutants or contaminants.
6. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, or 40 CFR Part 355, in which case the statutory or regulatory definitions shall apply.

INFORMATION REQUEST

REQUESTS REGARDING THE CLEAN AIR ACT SECTION 112(r) RISK MANAGEMENT PROGRAM AND GENERAL DUTY CLAUSE

1. EPA has information suggesting a document was issued on behalf of the Company on September 30, 2009, written by Dave Cook and Matt Anderson, and titled "Updated Inspection Strategies for Preventing Sulfidation Corrosion Failures in Chevron Refineries." Please provide that document, including any figures and attachments thereto. If the Company is not in possession of any document matching that description, please provide any document issued by the Company in 2009 addressing the Company's updated inspection strategies for preventing sulfidation corrosion failures in the Company's refineries, including any figures and attachments thereto.
2. EPA has information suggesting a document was issued on behalf of the Company after September 30, 2009, and titled "Chevron Piping Procedures/Guidelines for Sulfidation Corrosion." Please provide that document, including any figures and attachments thereto. If the Company is not in possession of any document matching that description, please provide any document issued by the Company after September 2009 addressing the Company's piping procedures and guidelines regarding sulfidation corrosion, including any figures and attachments thereto.

Documents are requested to be provided in electronic format, accompanied by a table in the following format, and providing the information described in the table.

CUSA Response			EPA CAA 114 Information Request - 10/17/2012				
Date Provided	CUSA Bates Numbers	CUSA CD Id	CAA 114 letter Request 10-17-2012	Doc. Date(s)	Document description/title	Author(s)	Process Unit
				9/30/2009	Internal Chevron communication titled "UPDATED INSPECTION STRATEGIES FOR PREVENTING SULFIDATION CORROSION FAILURES IN CHEVRON REFINERIES" including all Figures and Attachments.	Dave Cook and Matt Anderson	Refinery-wide
			At 10/1/2012 Inspection	Post-9/30/2009	Chevron Piping Procedures/Guidelines for Sulfidation Corrosion	unknown	Refinery-wide

DELIVERY RECEIPT FOR LETTER DATED October 17, 2012
ADDRESSED TO
Nigel Hearne, Manager
Chevron Richmond Refinery



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Request for Information
Chevron Richmond Refinery

Date: October 17, 2012

HAND DELIVERED TO:

Name

Title
CHEVRON RICHMOND REFINERY

Date

Representing Addressee:
Nigel Hearne, Manager
Chevron Richmond Refinery
841 Chevron Way
Richmond, CA 94801

WITNESSED BY:

Name

Title
US Environmental Protection Agency

Date